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June 15, 2021

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 14A  
New York, New York 10007

*Conference adjourned to  
August 9, 2021 at 4<sup>00</sup> p.m.  
So ordered. JGK/6/15/21  
U.S.D.S.*

**Re: Air Express Int'l USA, Inc. v. ZIM Integrated Shipping Services Ltd. et al.  
Case No. 1:21-cv-03308-JGK**

Dear Judge Koeltl,

We represent Plaintiff, Air Express International USA, Inc. d/b/a DHL Global Forwarding (hereinafter "Plaintiff" and/or "DGF"), in the above-referenced case. Pursuant to your Honor's Individual Practices ¶ 1(E) and ¶ 1(F), Plaintiff respectfully requests an adjournment of the Initial Pre-Trial Conference currently scheduled for Monday, June 21, 2021, at 12:00 p.m. This is Plaintiff's first request for an adjournment of the Initial Pre-Trial Conference.

Plaintiff filed the instant matter as a protective time bar action against Defendants as the ocean carrier concerning alleged damages during the international movement of goods from Koper, Slovenia to Fogelsville, Pennsylvania via New York, New York. (Compl. [D.E. 1] ¶ 8). At this time, Plaintiff is in the process of serving Defendants. Further, we are monitoring the status of the claim with the cargo interest in Slovenia as the instant action is a protective time bar action for indemnity against Defendants so that we may proceed in an efficient manner.

Accordingly, given the complex legal issues, along with time to serve the Defendants, counsel for Plaintiff respectfully requests a thirty (30) to forty-five (45) day adjournment of the Initial Pre-Trial Conference so that all parties have appeared.

Thank you for your consideration in this matter.

Respectfully submitted,

SPECTOR RUBIN, P.A.

*Andrew Spector*

Andrew R. Spector

cc: All Counsel of Record (via ECF)

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